

**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	)	
On Its Own Motion	)	
	)	
Consideration of the federal standard on	)	06-0525
interconnection in Section 1254 of the	)	
Energy Policy Act of 2005	)	

**Reply Comments of Commonwealth Edison Company**

Commonwealth Edison Company ("ComEd") submits these reply comments in response to the Commission's Order of July 26, 2006 ("Order") initiating this proceeding. In the Order, the Commission noted the directive contained in the Energy Policy Act of 2005 ("EPAct") that state commissions consider the standard articulated in the amendment to paragraph 15 of section 111(d) of the Public Utility Regulatory Policies Act of 1978 ("PURPA"), 16 USC 2621(d), for interconnecting generating facilities to local distribution facilities. That provision reads as follows:

(15) Interconnection. – Each electric utility shall make available, upon request, interconnection service to any electric consumer that the electric utility serves. For purposes of this paragraph, the term 'interconnection service' means service to an electric consumer under which an on-site generating facility on the consumer's premises shall be connected to the local distribution facilities. Interconnection services shall be offered based upon the standards developed by the Institute of Electrical and Electronics Engineers: IEEE Standard 1547 for Interconnecting Distributed Resources with Electric Power Systems, as they may be amended from time to time. In addition, agreements and procedures shall be established whereby the services are offered shall promote current best practices of interconnection for distributed generation, including but not limited to practices stipulated in model codes adopted by associations of state regulatory agencies. All such agreements and procedures shall be just and reasonable, and not unduly discriminatory or preferential.

ComEd, Ameren, and MidAmerican all filed comments agreeing with the EPAct assumption that IEEE Standard 1547 provides a sound basis for the interconnection of small

generators to the electric network. However, they also pointed out that the standard is articulated at a relatively high level and needs further clarification to give it application to real-world generators, utility operating systems, and electric networks.

In that regard, ComEd reported that a diverse group of stakeholders (including the National Renewable Energy Laboratory (NREL)) had already convened in a special working group and developed PJM-specific clarifications to IEEE 1547. The two resulting PJM manuals<sup>1</sup> set forth the criteria to evaluate interconnection requests (20MW and below) for the purpose of determining interconnection design and construction requirements within the PJM footprint for generators that intend to participate in the wholesale energy market and offer clarifications on many of the IEEE 1547 technical standards and requirements.

Also, ComEd noted that, with its sister company PECO, it was in the process of developing two sets of revised interconnection guidelines in light of, and consistent with, recent FERC, PJM, and state agency activity and with a determined intent to standardize (and, therefore, facilitate) interconnections in a non-discriminatory way. Those documents are now available and attached for the Commission's reference. "Exelon Energy Delivery Interconnection Guidelines for Generators 2 MVA or Less" provides interconnection guidelines for small generators 2 MVA or less. See <http://www.exeloncorp.com/NR/rdonlyres/71890D18-6BF8-4F13-A998-298A22A4D995/2448/2MWorlessExpeditedEEDGenerationrev5.pdf>.

"Exelon Energy Delivery Interconnection Guidelines for Generators Greater than 2 MVA and

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<sup>1</sup> The two PJM manuals are:

- **Attachment H:** Small Generator (10MW and below) Technical Requirements and Standards.  
<http://www.pjm.com/committees/working-groups/sgiwg/downloads/20060724-attachment-h-manual-14b-100305-2-10-mw.pdf>

- **Attachment H-1:** Small Generator (10MW to 20MW) Technical Requirements and Standards.  
<http://www.pjm.com/committees/working-groups/sgiwg/downloads/20060724-attachment-h-1-manual-14b-040406-10-20-mw.pdf>

Less than 20 MVA” contains interconnection guidelines for these larger generators. See <http://www.exeloncorp.com/NR/rdonlyres/71890D18-6BF8-4F13-A998-298A22A4D995/2449/SmallGENInterconnectionGuidelinesgreaterthan2Mwbut.pdf>. As noted previously, these new Exelon Energy Delivery (EED) guidelines are compatible with PJM’s new Technical Requirements and Standards, *supra*, and are compliant with FERC Order 2006. They are also “tiered” as suggested by the Environmental Law and Policy Center (“ELPC”) in its comments. Again, as provided in the first document, generators that are compliant with IEEE 1547.1 and meet the specified screening criteria will be given an expedited process, very similar to that described in Appendix E of FERC Order 2006 (provided that no other ComEd system modifications are required).

On a different note, the ELPC has filed comments urging the Commission to adopt its “Model Interconnection Rules”. Consideration of these proposed rules is premature. First, ELPC’s proposed rules are primarily *procedural* in nature, and, thus, beyond the scope of this initial round of comments, which are to focus on whether IEEE 1547 should be the applicable *technical* standard.

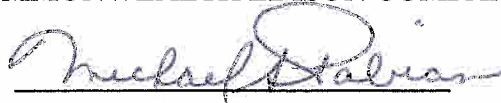
In that regard, while acknowledging that the issue is beyond the scope of this comment round, Staff has recommended that the Commission not engage in rulemaking regarding interconnection *procedures*, but rather require utilities to implement the interconnection standard via tariff provisions, thus permitting each utility, at least initially, the ability to tailor the procedures to the requirements of their own systems and processes. As Staff indicates, Illinois utilities either have already implemented the IEEE standard or are in the process of doing so, and a procedural rulemaking would be untimely before these implementation efforts had been given a chance to work. While a requirement to tariff procedures would itself pose significant issues,

ComEd believes that it would make sense for the Commission to adopt a staged approach, like that suggested by Staff, that would permit each utility to implement the technical standards *before* trying to determine whether procedural rules are even necessary. As Staff notes, “By prematurely entering into such a rulemaking, the Commission may try to “solve” problems that don’t exist.” Staff Comments at 5.

Nonetheless, if the Commission believes that it is necessary to address procedural rules at this time, ComEd recommends that the Commission start where the industry-wide, Staff-led workshops in distributed generation interconnection left off – with the draft rules issued by Staff on October 25, 2004, *and* the comments on that draft submitted by stakeholder in mid-December 2004.

Respectfully submitted,  
COMMONWEALTH EDISON COMPANY

By:



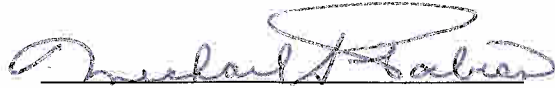
E. Glenn Rippie  
Foley & Lardner LLP  
321 N. Clark, Suite 2800  
Chicago, IL 60610  
(312) 832-4910  
[grippy@foley.com](mailto:grippy@foley.com)

Michael S. Pabian  
Assistant General Counsel  
Exelon Business Services Company  
10 South Dearborn Street, 35th Floor  
Chicago, Illinois 60603  
(312) 394-5831  
[michael.pabian@exeloncorp.com](mailto:michael.pabian@exeloncorp.com)

DATED: November 22, 2006

## **Certificate of Service**

I, Michael S. Pabian, hereby certify that I have served a copy of the foregoing Reply Comments of Commonwealth Edison Company on the parties by electronic mail, this 22<sup>nd</sup> day of November, 2006.

A handwritten signature in blue ink, appearing to read "Michael S. Pabian", is written over a horizontal line.

Michael S. Pabian